

May 16, 2024

VIA ECF

Hon. George C. Hanks, Jr.
United States District Judge
Southern District of Texas
515 Rusk St., Room 6202
Houston, TX 77002

Re: In re Alta Mesa Resources Securities Litigation, 4:19-cv-00957-GCH,
4:22-cv-01189, 4:22-cv-02590

Dear Judge Hanks:

Defendant Riverstone Holdings LLC (“Riverstone”) has asserted a claim of attorney-client privilege over portions of one of the exhibits filed by Class Plaintiffs in opposition to Riverstone’s motion for summary judgment on Plaintiffs’ Section 20(a) claim (ECF Nos. 569-15, 570, 672-15, 673). The portions of the exhibit over which Riverstone asserts privilege are not germane to the Class Plaintiffs’ opposition (the exhibit was submitted as evidence of the fact that, on December 17, 2018, Mr. Coats provided comments to Riverstone on an Alta Mesa Resources draft press release and not for the content of Mr. Coats’s comments).

Therefore, Class Plaintiffs and Riverstone jointly and respectfully request that the Court consider the attached (redacted) PX 347-R instead of the originally submitted PX 347 and deem PX 347 replaced by PX 347-R for all purposes. Class Plaintiffs and Riverstone further jointly and respectfully request that the Court restrict public access to the original PX 347, including by disabling the link to the publicly filed copy of that exhibit on PACER (ECF No. 672-15). The undersigned counsel would be pleased to answer any questions the Court may have.

Respectfully submitted,

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